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11 ONIKA TANYA MIRAJ AND HARAJUKU BARBIE MUSIC, LLC

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14 UNITED STATES DISTRICT COURT
15 CENTRAL DISTRICT OF CALIFORNIA

16 JULIUS JOHNSON, an individual,) CASE NO. 2:23-cv-05061-PA-
17 Plaintiff,) AFM
18 vs.)
19 ONIKA TANYA MARAJ P/K/A NICK)
20 MINAJ, in individual; UNIVERSAL MUSIC)
21 GROUP, INC., a Delaware corporation;)
22 SONGS OF UNIVERSAL, INC., a)
23 California corporation; MICHAEL LEN)
24 WILLIAMS II, P/K/A MIKE WILL MADE)
IT, an individual; KAZARION FOWLER)
PKA SKOOLY, an individual; MONEY)
MACK MUSIC, INC., a Louisiana)
corporation; HARAJUKU BARBIE MUSIC,)
LLC, a Delaware limited liability company;)
ESTHER RENAY DEAN P/K/A ESTHER)
DEAN, an individual; MARCUS BELL, an)
individual; SOUNDS FROM)
EARDRUMMERS LLC, a Georgia)
Corporation; WB MUSIC CORP., a)
Delaware Corporation; DAT DAMN DEAN;)
and DOES 1-10, inclusive.)
Defendants.)

Honorable Percy Anderson

Date: November 6, 2023

Time: 1:30 p.m.

Place: Courtroom 9A

1 TO THE COURT, THE PARTIES, AND TO THEIR ATTORNEYS OF
2 RECORD:

3 PLEASE TAKE NOTICE THAT Defendants Onika Tanya Miraj and
4 Harajuku Barbie Music, LLC (“Joining Defendants”) hereby move to join in
5 Defendants Michael Len Williams, II; Sounds From Eardrummers, LLC; W
6 Chappell Music Corp f/k/a WB Music Corp. (“Moving Defendants”)’s Motion to
7 Dismiss Plaintiff’s Complaint filed in the above-entitled action on October 5, 2023.
8 (ECF No. 38.)

9 Joining Defendants move to join in each argument asserted by Moving
10 Defendants in their motion to dismiss, all of which apply equally to Joining
11 Defendants: (1) The complaint is an impermissible “shotgun pleading” in violation
12 of Fed. R. Civ. P. 8; (2) The complaint improperly alleges direct, vicarious, and
13 contributory copyright infringement against all Defendants; (3) The complaint fails
14 to plausibly allege direct infringement due to (a) failure to allege copying; (b)
15 failure to allege ownership; (c) failure to allege access; and (d) failure to allege
16 striking similarity; (4) Causes of action 5 through 8 are preempted; and (5) The
17 complaint fails to allege conversion.

18 For the reasons identified by Moving Defendants in the motion to dismiss,
19 the Complaint should be dismissed in its entirety with prejudice as to Joining
20 Defendants.

21 Dated: October 5, 2023

GORDON REES SCULLY
MANSUKHANI, LLP

23 By: /s/ Susan B. Meyer
24 Mark S. Posard
25 Susan B. Meyer
26 Attorneys for Defendants
27 Onika Tanya Miraj and Harajuku
28 Barbie Music, LLC

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